



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

APR 30 2019

Michael E. Schrier, Director of Design & STEM Projects
University of Connecticut, University Planning, Design, & Construction
31 LeDoyt Road, Unit 3038
Storrs, Connecticut 06269

Re: Modification 4 to Phase 1 PCB Plan and *November 3, 2017 PCB Alternative Decontamination, Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c) and § 761.79(h)*
University of Connecticut - Edward V. Gant Science Complex
Storrs, Connecticut

Dear Mr. Schrier:

This is in response to the University of Connecticut (UConn) request to modify its Self-Implementing Cleanup and Disposal Plan & Risk-Based Disposal Plan Phase 1 as revised August 21, 2017 (PCB Plan), to address additional PCB contamination identified at the Edward V. Gant Science Complex (the Site) located at 196 Auditorium Road, Storrs, Connecticut. The modification was submitted in accordance with Attachment 1, Condition 24 of the *November 3, 2017 PCB Alternative Decontamination, Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c) and § 761.79(h)* (EPA Approval).

UConn has identified paint containing PCB concentrations less than (<) 10 parts per million on metal surfaces and the plaster soffits (i.e., ceilings) in Stairway A. UConn has determined that it would be difficult to remove all the paint from the metal surfaces and the plaster soffits because of the Stairway A configuration. As a result, UConn has proposed to encapsulate the painted metal components (i.e., handrails, risers, posts/balusters, stringers, soffits) and plaster soffits found in Stairway A with either epoxy paint or a physical barrier.

Based on review of the submitted information, EPA has determined that incorporation of Stairway A into the existing PCB Plan and EPA Approval is reasonable. The proposed encapsulation of the painted metal components and plaster soffits should effectively prevent direct exposure of these PCB-contaminated surfaces to building users. Thus, EPA is approving your modification request with the following conditions:

1. Unless otherwise modified by this letter, UConn must comply with all of terms and conditions specified in the EPA Approval.

2. The encapsulated surfaces in Stairway A shall be included in the deed restriction and the long-term maintenance and monitoring plan (MMP), as required under Conditions 17, 18 and 22 of the EPA Approval.
3. The activities authorized under this letter shall be incorporated into the Final PCB Completion Report as required under Condition 33 of the EPA Approval.

Under the EPA Approval and this modification approval, EPA is reserving its right to require additional mitigation measures should the results of the initial or long-term sampling indicate that the PCBs at the Site present an unreasonable risk of injury to building users.

Should you have any questions regarding this matter, please contact Katherine Woodward at (617) 918-1353 or Kimberly Tisa at (617) 918-1527.

Sincerely,

A handwritten signature in cursive script, reading "Nancy Barnmakian".

Nancy Barnmakian, Acting Division Director
Land, Chemicals and Redevelopment Division

cc James T. Olsen, Tighe & Bond
Gary Trombly, CTDEEP
File